nTelos

401 Spring Lane
Waynesboro, VA 22980

February 25, 2009

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36 – CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of NTELOS Inc., please find the attached 2008 annual CPNI Certification and accompanying Statement which is being filed pursuant to Commission Rule 64.2009(e).

If you have any questions regarding this filing, please contact me at 540-946-8677 or email mcdermottm@ntelos.com

Sincerely,

Mary McDermott
Senior Vice President – Legal and Regulatory Affairs

Attachments

Cc: Best Copy and Printing, Inc., (via email FCC@BCPIWEB.com)

NTELOS Inc.

401 Spring Lane Plaza, Waynesboro, VA 22980

Annual 47 C.F.R. 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 25, 2009

Names of Companies Covered by this Certification:

NTELOS Inc. is the holding company for the following affiliated companies:

Company	499 Filer ID
NTELOS Telephone Inc.	807075
NTELOS Network Inc.	807076
NTELOS of West Virginia	807074
Virginia RSA 6 LLC	807081
Roanoke and Botetourt Telephone Company	807819
R&B Network, Inc.	807820
The Beeper Company	807821
Virginia PCS Alliance L.C., (includes Richmond 20 MHZ, LLC) dba NTELOS	816030
West Virginia PCS Alliance L.C., dba NTELOS	818784

Name of signatory: Mary McDermott

Title of signatory: Senior Vice President – Legal and Regulatory Affairs

I, Mary McDermott, certify that I am an officer of NTELOS Inc. and the affiliated companies named above (collectively and individually "Company") and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). *See* 47 C.F.R. 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2008 or related to 2008. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompany statement.

The Company has not received any customer complaints in 2008 concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

Signed _Mary McDermott_

Attachment

NTELOS Inc.
401 Spring Lane Plaza, Waynesboro, VA 22980

2008 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE
February 25, 2009

This statement accompanies the Company's 2008 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009 (e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

1.   Identification of CPNI

NTELOS has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2.   Identification of Services Affected by CPNI Rules

NTELOS has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3.   Identification of Permissible Uses of CPNI without Customer Authorization

NTELOS has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under Section 64.2005.

4.   Identification of Uses of CPNI Requiring Customer Authorization

NTELOS has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5.   Customer Notification and Authorization Process

NTELOS does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, NTELOS will initiate the notification and Opt-Out process. NTELOS does not provide CPNI to other parties and thus has not used the opt-in approval process. NTELOS has trained employees regarding prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, NTELOS will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

6.   Record of Customer CPNI Approval/Non-Approval

At such time as NTELOS may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, NTELOS will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7.   Procedures Protecting Against Disclosure of CPNI

NTELOS has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

> Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

> NTELOS provides customers with on-line access to customer account information for which NTELOS has initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e).

> NTELOS has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

> NTELOS has implemented procedures to notify customers of account changes.

8.   Auctions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, NTELOS makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

> Not applicable.   No actions taken against data-brokers.
> No customer complaints received.

9.   Disciplinary Process

NTELOS has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009 (b).

10.   Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, NTELOS will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

11.   Procedures for Notifying Law Enforcement of CPNI Security Breaches

NTELOS has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.